



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

August 29, 2022

VIA ECF

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Mancera v. Jaddou*, No. 21 Civ. 5698 (RA)**

Dear Judge Abrams:

This Office represents the government in the above-referenced action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate a Petition for Alien Entrepreneur (Form I-526). On July 5, 2022, the Court granted the government’s consent letter motion to stay this matter for sixty days. *See* ECF No. 23. I write respectfully to request that the Court extend the stay in this matter for an additional sixty days (*i.e.*, from August 31, 2022, to October 31, 2022).<sup>1</sup>

As explained in the government’s previous request, *see* ECF No. 22, USCIS recently granted a request to expedite the plaintiff’s Form I-526 and anticipated that it would be able to adjudicate the petition within sixty days. However, on July 11, 2022, USCIS issued a Notice of Intent to Deny and is awaiting the plaintiff’s response. As such, the government requests that the matter be stayed for an additional sixty days to allow USCIS time to receive the plaintiff’s response and to determine next steps, which could potentially render this action moot.

Plaintiff consents to this request. The Court previously granted the government’s request to stay the case due to a lapse in the statutory authorization for the Regional Center Program, under which the plaintiff filed her I-526 petition. *See* ECF Nos. 12, 14, and 17.

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<sup>1</sup> Given that a sixty-day extension falls on Sunday, October 30, 2022, the deadline would be extended to Monday, October 31, 2022. *See* Fed. R. Civ. P. 6(a)(1).

I thank the Court for its consideration of this letter.

Respectfully submitted,

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*Attorney for Defendant*

cc: Counsel of Record (via ECF)

Application granted.

SO ORDERED.



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Hon. Ronnie Abrams  
August 30, 2022